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*Attorneys for Defendant Findlay Management Group*

**UNITED DISTRICT COURT**

**DISTRICT OF NEVADA**

HOUSTON CASUALTY COMPANY, a  
foreign corporation,

Plaintiff,

v.

FINDLAY MANAGEMENT GROUP, a  
Nevada domestic corporation,

Defendant.

Case No. 2:24-cv-01459-GMN-NJK

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
AMENDED COMPLAINT [ECF NO. 5]  
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Houston Casualty Company, on one hand, and Defendant Findlay Management Group, on the other hand, by and through their respective undersigned attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s approval to extend time for Defendant to respond to the Amended Complaint (ECF No. 5). The current deadline is September 24, 2024. This is the first request for extension concerning this deadline.

1. On August 9, 2024, Plaintiff filed its Complaint (ECF No. 1) against Defendant, which was not served on Defendant.

2. On August 28, 2024, Plaintiff filed its Amended Complaint (ECF No. 5) against Defendant.
3. On September 3, 2024, Defendant was served with Plaintiff's Amended Complaint (ECF No. 5) and the Summons (ECF No. 12).
4. The current deadline for Defendant to respond to the Amended Complaint (ECF No. 5) is September 24, 2024.
5. Subject to the Court's approval, the Parties have agreed that Defendant shall have an additional thirty (30) days to respond to the Amended Complaint (ECF No. 5). Defendant waives any service of process and personal jurisdiction defects and agrees not to contest those issues in this case via motion or otherwise.
6. The requested extension of thirty (30) days is based on the complexity of issues raised in this case, which primarily revolve around whether insurance coverage exists for a ransomware attack on Defendant's computer network. (*See* ECF No. 5 at ¶¶ 1, 8.) An additional thirty (30) days will allow Defendant's outside counsel sufficient time to get up to speed. The additional thirty (30) days is also necessary to accommodate scheduling conflicts of Defendant's counsel that are presented by other matters and commitments that existed before this case was filed.

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7. Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

DATED: September 18th, 2024

DATED: September 18th, 2024

/s/ Thomas H. Cellilli

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**IT IS SO ORDERED.**

  
~~UNITED STATES DISTRICT JUDGE/~~  
**UNITED STATES MAGISTRATE JUDGE**  
Dated: September 19, 2024